

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE: TARGET CORPORATION CUSTOMER
DATA SECURITY BREACH LITIGATION,

MDL No. 14-2522 (PAM/JJK)

THIS DOCUMENT RELATES TO ALL
ACTIONS

DECLARATION OF JAMES J. PIZZIRUSSO

I, James J. Pizzirusso, declare that the following is true:

I am a partner at the law firm Hausfeld LLP and a member of the Financial Institution Cases Steering Committee. I make this declaration of my own personal knowledge and, if called to do so, could testify competently as to the facts provided herein under oath.

1. On July 13, 2015, I participated in a meet and confer with counsel for Target about Target's November 19, 2014 privilege. Counsel informed me that a number of documents on its privilege log had been inappropriately redacted or withheld, and Target would re-review the privilege log and make a subsequent production of documents.

2. On August 20, 2015, Target made an additional production of 68 documents. Target's production included 62 documents produced in full, and 6 documents with reduced redactions.

3. Attached hereto as Exhibit A is a true and correct copy of a June 17, 2015 letter from myself to Michelle Visser, attaching privilege log challenges to Target's November 19, 2014 privilege log. This document is being filed under seal.

4. Attached hereto as Exhibit B is a true and correct copy of excerpts from the final transcript of Beth Jacob's August 28, 2015 deposition. This document is being filed under seal.

5. Attached hereto as Exhibit C is a true and correct copy of a document produced by Target in discovery in this litigation and bearing the bates stamp TGTMDLC00070533. This document is being filed under seal.

6. Attached hereto as Exhibit D is a true and correct copy of a September 14, 2015 letter from Michelle Visser to Joseph G. Guglielmo.

7. Attached hereto as Exhibit E is a true and correct copy of a document produced by Target in discovery in this litigation and bearing the bates stamp TGTMDLC00114175-TGTMDLC00114178. This document is being filed under seal.

8. Attached hereto as Exhibit F is a true and correct copy of a document produced by Target in discovery in this litigation and bearing the bates stamp TGTMDLC00096037-TGTMDLC00096047. This document is being filed under seal.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed this 22nd day of September, 2015, at Washington, DC.

/s/ James J. Pizzirusso
James J. Pizzirusso